

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION**

UNITED STATES OF AMERICA, *ex rel.*)
DILBAGH SINGH, M.D., PAUL KIRSCH, M.D.,)
V. RAO NADELLA, M.D., and)
MARTIN JACOBS, M.D.,)

Plaintiffs,)

v.)

BRADFORD REGIONAL MEDICAL CENTER,)
V & S MEDICAL ASSOCIATES, LLC,)
PETER VACCARO, M.D.,)
KAMRAN SALEH, M.D.,)
and DOES I through XX,)

Defendants.)

CIVIL ACTION NO. 04-186E

RELATORS' NOTICE OF SUPPLEMENTAL AUTHORITY

Relators hereby bring to the Court's attention the recent ruling by Magistrate Judge Hay of this district in *United States ex rel. Landsberg v. Levinson*, Civil Action No. 03-1429 (W.D. Pa. Feb. 13, 2006), rejecting arguments similar to those made by Defendants in this case. A copy of this decision is attached as Exhibit A.

Relators also bring to the Court's attention the recent ruling by District Judge Kelly of the Eastern District of Pennsylvania in *Gibbons v. Kvaerner Philadelphia Shipyard, Inc.*, Civil Action No. 05-685 (E.D. Pa. Feb. 10, 2006), which also rejected arguments similar to those made by Defendants. A copy of this decision is attached as Exhibit B.

This 14th day of February, 2006.

Respectfully submitted,

/s/ Andrew M. Stone

Andrew M. Stone, Esquire

(Pa. #35176)

STONE & STONE

828 Frick Bldg. 437 Grant Street.

Pittsburgh, Pa. 15219

Phone: (412) 391-2005

Fax: (412) 391-0853

/s/ G. Mark Simpson

G. Mark Simpson

Georgia Bar No. 647725

BOTHWELL & SIMPSON, P.C.

304 Macy Drive

Roswell, Georgia 30076

Phone: (770) 643-1606

Fax: (770) 643-1442

Attorneys for the Plaintiffs/Relators

IN THE UNITED STATES DISTRICT COURT

**FOR THE WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION**

UNITED STATES OF AMERICA, *ex rel.*)
DILBAGH SINGH, M.D., PAUL KIRSCH, M.D.,)
V. RAO NADELLA, M.D., and)
MARTIN JACOBS, M.D.,)
))
Plaintiffs,) CIVIL ACTION NO. 04-186E)
))
v.))
))
BRADFORD REGIONAL MEDICAL CENTER,) Judge Cohill)
V & S MEDICAL ASSOCIATES, LLC,))
PETER VACCARO, M.D.,))
KAMRAN SALEH, M.D.,))
and DOES I through XX,))
))
Defendants.)

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of February, 2006, I caused a copy of the Relators' Notice of Supplemental Authority to be filed electronically and served electronically and/or served by first-class mail, postage prepaid, on:

Jay D. Marinstein, Esq.
Carl J. Rychcik, Esq.
Fox Rothschild L.L.P.
625 Liberty Avenue
29th Floor
Pittsburgh, Pa. 15222-3115

Robert L. Eberhardt, Esq.
United States Attorney's Office
Civil Division
USPO & Courthouse
Pittsburgh, Pa. 15219

Daniel M. Mulholland III, Esq.
Henry M. Casale, Esq.
Horty Springer & Mattern, P.C.
4614 Fifth Avenue
Pittsburgh, Pa. 15213

Michael Granston, Esq.
U.S. Department of Justice
Commercial Litigation Branch
P.O. Box 261
Ben Franklin Station
Washington, D.C.

/S/ Andrew M. Stone